

UNITED STATES BANKRUPTCY COURT
FOR THE
WESTERN DISTRICT OF KENTUCKY

IN RE:

Debtor(s)

CASE NO.

MOTION TO AVOID LIEN

Debtor, by counsel, hereby moves the Court pursuant to Section 522(f) of the Bankruptcy Code to avoid the lien on the following described property:

In support of said Motion, Debtor states:

1. _____, a creditor, filed a lien in the Office of the Clerk of _____ and a copy of the lien is attached.
2. The amount of the claim which the lien secures is \$_____.
3. The above mentioned lien is a _____ lien.
4. Debtor submits the following information on the value of the property:
 - A). Fair Market Value: \$_____.
 - B). Value listed in Schedules: \$_____.
 - C). Value according to records of County Property Valuation Administration: \$_____.
 - D). Purchase Price: \$_____.
 - E). Date of Purchase: _____.

F). Appraised Value (if recently appraised): \$_____.

G). Senior mortgages or liens on the property: _____.

5. The trustee has/has not abandoned the property.

6. The debtor does/does not claim an exemption of \$_____ in said property.

7. The lien held by the creditor impairs the exemption of the debtor in the property described in the motion.

WHEREFORE, the debtor moves the Court to order the lien void and for such other relief as may be entitled.

*Any objections to this Motion must be filed within 15 days of the Certificate of Service date below.

Should no objection be received, an Order approving this Motion to Avoid Lien may be entered.

Attorney for Debtor(s)

Address

Phone Number

CERTIFICATE OF SERVICE

I certify that a copy of this motion was served by first class mail upon, _____

_____ this _____ day of _____, 20 _____.

Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT
FOR THE
WESTERN DISTRICT OF KENTUCKY

IN RE:

Debtor(s))
CASE NO. _____)
_____)

ORDER

Notice having been given and no objections having been filed to the Motion to Avoid Lien;

IT IS HEREBY ORDERED that the lien of
_____ in the following described property is,
AVOIDED.

A copy of this Order shall be mailed to the attorney for debtor(s), trustee, and the above-named creditor.

Louisville, Kentucky
Dated: _____

UNITED STATES BANKRUPTCY JUDGE